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BEFORE THE FAIR POLITICAL PRACTICES COMMISSION  
STATE OF CALIFORNIA

In the Matter of	)	FPPC No.: 03/514
	)	
	)	
C. TERRY BROWN, CHARLENE A.	)	STIPULATION, DECISION and
BROWN, and ATLAS HOTELS, INC.,	)	ORDER
	)	
	)	
Respondents.	)	

Complainant Mark Krausse, Executive Director of the Fair Political Practices Commission, and Respondents C. Terry Brown, Charlene A. Brown, and Atlas Hotels, Inc. hereby agree that this stipulation will be submitted for consideration by the Fair Political Practices Commission at its next regularly scheduled meeting.

The parties agree to enter into this stipulation to resolve all factual and legal issues raised in this matter, and to reach a final disposition without the necessity of holding an administrative hearing to determine the liability of Respondents.

Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural rights set forth in sections 83115.5, 11503, and 11523 of the Government Code, and in section 18361 of title 2 of the California Code of Regulations. This includes, but is not limited to, the right to personally appear at any administrative hearing held in this matter, to be represented by an attorney at Respondents' own expense, to confront and cross-examine all witnesses testifying at the hearing, to

subpoena witnesses to testify at the hearing, to have an impartial administrative law judge preside over the hearing as a hearing officer, and to have the matter judicially reviewed.

It is further stipulated and agreed that Respondents C. Terry Brown, Charlene A. Brown, and Atlas Hotels, Inc. violated the Political Reform Act by failing to timely disclose a late contribution in a properly filed paper late contribution report, in violation of section 84203, subdivision (a) of the Government Code (2 counts), and by failing to disclose a late contribution in a properly filed electronic late contribution report, in violation of section 84605, subdivision (a) of the Government Code (2 counts), as described in Exhibit 1. Exhibit 1 is attached hereto and incorporated by reference as though fully set forth herein. Exhibit 1 is a true and accurate summary of the facts in this matter.

Respondents agree to the issuance of the decision and order, which is attached hereto. Respondents also agree to the Commission imposing upon them an administrative penalty of Fifteen Thousand Dollars (\$15,000). A cashier's check from Respondents in said amount, made payable to the "General Fund of the State of California," is submitted with this stipulation as full payment of the administrative penalty, to be held by the State of California until the Commission issues its decision and order regarding this matter. The parties agree that in the event the Commission refuses to accept this stipulation, it shall become null and void, and within fifteen (15) business days after the Commission meeting at which the stipulation is rejected, all payments tendered by Respondents in connection with this stipulation shall be reimbursed to Respondents. Respondents further stipulate and agree that in the event the Commission rejects the stipulation, and a full evidentiary hearing before the Commission becomes necessary, neither any member of the Commission, nor the Executive Director, shall be disqualified because of prior consideration of this stipulation.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Mark Krausse, Executive Director  
Fair Political Practices Commission

Dated: \_\_\_\_\_

\_\_\_\_\_  
C. Terry Brown, Respondent

1  
2 Dated: \_\_\_\_\_  
3 \_\_\_\_\_  
4 Charlene A. Brown, Respondent

5 Dated: \_\_\_\_\_  
6 \_\_\_\_\_  
7 Atlas Hotels, Inc., Respondent  
8 By \_\_\_\_\_  
9 (Type or print name here)

10 Dated: \_\_\_\_\_  
11 \_\_\_\_\_  
12 Barton E. DeBolt, Law Offices of Garrett & Tully  
13 Attorneys for Respondents

14 **DECISION AND ORDER**

15 The foregoing stipulation of the parties “In the Matter of C. Terry Brown, Charlene A. Brown,  
16 and Atlas Hotels, Inc., FPPC No. 03/514,” including all attached exhibits, is hereby accepted as the final  
17 decision and order of the Fair Political Practices Commission, effective upon execution below by the  
18 Chairman.

19 IT IS SO ORDERED.

20 Dated: \_\_\_\_\_  
21 \_\_\_\_\_  
22 Liane M. Randolph, Chairman  
23 Fair Political Practices Commission  
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